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not therefore be predicated on anything said during that time. Evidently everything was merely suppositional. Accused supposed he was being tried, and the court and jury supposed they were trying him. Emery supposed he was a witness, and, presumably, supposed he was giving perjured testimony; but they were all apparently wrong. The supposed witness was apparently only telling an interesting story without regard to truth, and the judges and jurors were only interested listeners. It may be hard on Emery to thus be deprived of a two-years sentence in the penitentiary, but of such are the rigors of the law.

No Recovery for Physical Consequences of Fright.—A mother, with two young children, was passing in a city street when there was an explosion of a pot of molten lead, some of the drops being cast upon her clothes and hand. She recovered \$2,000 damages for the negligence of defendant, but the Appellate Division of the New York Supreme Court in *Hack v. Dady*, 118 New York Supplement, 906, reversed the judgment, holding that, as the injury was very slight, a radical impairment of her nervous system, general health, and bodily organs, resulting in three successive miscarriages, was not an ordinary and natural result of the accident, but the physical consequence of her fright, and, since damages could not be recovered for mere fright from another's negligence, there could be no recovery for the physical consequence of the fright.

False Imprisonment by Charitable Institution.—The House of the Good Shepherd located at Detroit, Mich., is one of 300 institutions of like character for moral reformation of girls and women, and for the protection of such as may be exposed to particular dangers from injuries affecting character and virtue. Some of the inmates come to it voluntarily, some are placed there at the request of parents or guardians, and some are sent to it instead of the State Industrial School, on conviction of crime. In the case of *Gallon v. House of Good Shepherd*, 122 Northwestern Reporter, 631, the evidence, while conflicting, went to show that plaintiff's ward and sister, for whose benefit the action was instituted, was induced in some way to enter the defendant institution, and was there confined for seven years against her will, and without knowledge of her relatives, who were residing in Detroit and who made efforts to discover her whereabouts without avail. One defense interposed to the action was that the institution was, on account of the statute allowing detention therein of some persons convicted of crime, a governmental agency, and therefore not liable for torts of its agents or employees; another, that it was a public charitable institution, and that funds raised for charitable purposes could not be diverted for payment of injuries sustained through illegal or tortious acts of its officers or servants.